

AARON FORD  
Attorney General  
PAUL MATA  
Deputy Attorney General  
Nevada Bar No. 14922  
State of Nevada  
Office of the Attorney General  
555 E. Washington Ave., Ste. 3900  
Las Vegas, Nevada 89101  
Tele: (702) 486-0661  
Fax: (702) 486-3768  
Email: [pmata@ag.nv.gov](mailto:pmata@ag.nv.gov)

*Attorneys for Defendants State of Nevada,  
Department of Health And Human Services,  
Division of Child and Family Services,  
Desert Willow Treatment Center;  
Dr. Gwendolyn Greene; Ronnika Rupert,  
and Abbie Jenkins*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

GODFREY MERE, an individual,  
  
Plaintiff,

vs.

STATE OF NEVADA, Desert Willow  
Treatment Center; DR. GWENDOLYN  
GREENE, Administrator, Desert Willow  
Treatment Center; RONNIKA RUPERT,  
Director of Nursing, Desert Willow Treatment  
Center; ALBIE JERKINS, Quality Assurance  
Director, Desert Willow Treatment Center;  
DOES 1-00 and ROES I-X, inclusive,  
  
Defendants.

Case No.: 2:23-cv-00487-JCM-DJA

**STIPULATION, REQUEST AND  
ORDER TO EXTEND TIME FOR  
DEFENDANTS TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

**[FIRST REQUEST]**

Pursuant to LR 6-1, Plaintiff GODFREY MERE ("Plaintiff"), by and through his  
counsel of record, GUINNESS OHAZURUIKE, ESQ. of the Guinness Law Firm, and  
Defendants STATE OF NEVADA, DEPARTMENT OF HEALTH AND HUMAN SERVICES,  
DIVISION OF CHILD AND FAMILY SERVICES, DESERT WILLOW TREATMENT

1 CENTER; DR. GWENDOLYN GREENE; RONNIKA RUPERT; and ABBIE JENKINS  
2 (collectively “Defendants”), by and through their attorneys of record, AARON FORD, Attorney  
3 General for the State of Nevada, and PAUL MATA, Deputy Attorney General, hereby submit  
4 their Stipulation, Request, and Order Extending Time to Respond to Plaintiff Godfrey Mere’s  
5 Complaint. This is the first request for an extension of time to file a response by the Defendants.

6 Plaintiff Godfrey Mere filed his Complaint (ECF No. 1) on April 4, 2023 (the  
7 “Complaint”). Plaintiff served the individual defendants on April 6, 2023. Plaintiff served the  
8 State of Nevada Office of the Attorney General on April 10, 2023. Pursuant to Federal Rule of  
9 Civil Procedure 12(a), the current deadline for the Defendants to answer or otherwise respond to  
10 the Complaint is April 27, 2023, and May 1, 2023, respectively.

11 Mr. Mata is assigned to represent the Defendants but has only recently joined the  
12 Attorney General’s Office and is getting up to speed on the facts of this matter. Additional time  
13 is also needed to review the 159 allegations with Mr. Mata’s clients to prepare the appropriate  
14 response. Counsel for Defendants requested, and Plaintiff’s Counsel has agreed, to a short  
15 extension of time for Defendants to respond to Plaintiff’s Complaint.

16 Therefore, upon agreement by and between all the parties, through their respective  
17 counsel, the undersigned counsel requests that this Court grant the Defendants an extension of  
18 time, up to and including, Monday, May 8, 2023, to file a response to the Complaint.

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1 By entering into this stipulation, none of the parties waive any rights they have under  
2 statute, law, or rule with respect to the Complaint.

3 APPROVED AS TO FORM AND CONTENT this 26th day of April 2023.

4 AARON FORD  
5 Attorney General

GUINNESS LAW FIRM

6 By: /s/Paul Mata  
7 PAUL MATA  
8 Deputy Attorney General  
9 Nevada Bar No. 14922  
555 E. Washington Ave. Ste. 3900  
Las Vegas, Nevada 89101  
10 **Attorney for Defendants**

By: /s/ Guinness Ohazuruike, Esq.  
GUINNESS OHAZURUIKE, ESQ.  
Nevada Bar No. 11231  
6845 W. Charleston Blvd. #A  
Las Vegas, NV 89117  
**Attorney for Plaintiff**

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12 **IT IS SO ORDERED:**

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14 DATED this 27th day of April 2023.

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UNITED STATES MAGISTRATE JUDGE